

The State Agency for Historic Preservation

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWERENCE OAKS, EXECUTIVE DIRECTOR

September 15, 2008

Mr. Walter D. Dabney, Director of State Parks Texas Parks and Wildlife Department 4200 Smith School Road Austin, TX 78744

Re:

Project review under Section 106 of the National Historic Preservation Act of 1966 and the Antiquities Code of Texas, Project Plan for Dry Berthing of the Battleship Texas, Houston, Harris County, Texas (SAL, DOD/USACE/106)

Dear Mr. Dabney,

The Texas Historical Commission appreciates your and your staff's time in meeting with us on July 17, 2008, to discuss future plans for the Battleship Texas. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission, which is also the agency responsible for administering the Antiquities Code of Texas.

If the appropriate studies conclude that Battleship Texas is to remain at its present location on the Houston Ship Channel adjacent to the San Jacinto Battleground, we are supportive of Texas Parks and Wildlife Department's efforts to plan for the ship's long-term preservation through construction of a dry berth. Based on your office's project plan and the condition assessment and concept development reports prepared by Proceanic, Ltd., presented at our meeting, it is our understanding that the battleship is in deteriorated condition due to the corrosive saltwater environment of the ship channel. Major repairs were accomplished by towing the ship to a dry dock on Galveston Bay in 1988-1990; however, availability of facilities in the area has become increasingly limited, their use incurs significant expense, and most importantly, the condition of the battleship prevents a long-distance tow. We concur that a permanent dry berth for the battleship would provide a reasonable solution to these issues and more readily allow for its ongoing maintenance, assuming that no additional adverse impact is created to the Battleground.

Furthermore, we appreciate that historic preservation considerations were included in the criteria for evaluating potential options, specifically, that an appropriate solution "must be, within reason, reversible" and that the dry berth and associated facilities must visually and physically respect the Battleground site. Under these parameters, two of the four alternatives explored to date should be considered unacceptable. Both the land based elevated proposal and the dedicated barge/floating dock would raise the ship above sea level and thereby create a significant visual incursion on the Battleground. The elevated proposal would also be difficult and extremely costly to reverse. By contrast, the two graving dock options would maintain the height of the ship at or below its present level, could reasonably be reversed, and would present unique opportunities for viewing and interpretation. The sheet piling graving dock would be surrounded by water on three sides, and if held close to the ship's hull, could create the illusion that the ship remains floating. The earthen berm graving dock resembles historic Navy dry docks, and would offer possibilities for the interpretation of this history.

We look forward to further consultation with your office as these plans and other alternatives are explored and developed, and we hope to maintain a partnership that fosters effective historic preservation. Thank you for starting this dialogue and outlining the future steps of our consultation, including review under Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas as a State Archeological Landmark. If you have any questions concerning our review or if we can be of further assistance, please contact Elizabeth Butman at 512/463-7687.

Sincerely,

F. Lawerence Oaks, State Historic Preservation Officer

FLO/eb

Cc:

Chris Greer, Project Manager, Infrastructure Division Region III, Texas Parks and

Wildlife Department

Patrick Van Pelt, Chair, Harris County Historical Commission